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ATTORNEY FOR DEFENDANT
CENTRAL TURF FARMS, INC.

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:	§	
	§	
GREENWOOD LANDSCAPE	§	
SERVICES, INC.	§	BK. CASE NO. 05-32087-BJH-7
Debtors.	§	
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	§	
WATERMARK CONSTRUCTION, L.P.	§	
Plaintiff	§	
	§	
v.	§	Adversary No. 05-03428-BJH
	§	
GREENWOOD LANDSCAPE SERVICES	§	
INC., ET AL	§	
Defendants	§	

ORIGINAL ANSWER OF CENTRAL TURF FARMS, INC.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Central Turf Farms, Inc. answers Plaintiff's Complaint for Declaratory Judgment as follows:

1. Defendant has insufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 1 of the Complaint.
2. Defendant admits paragraph 2 of the Complaint.
3. Defendant admits paragraph 3 of the Complaint.

4. Defendant has insufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 4 of the Complaint.

5. Defendant admits paragraph 5 of the Complaint.

6. Defendant has insufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 6 of the Complaint.

7. Defendant has insufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 7 of the Complaint.

8. Defendant has insufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 8 of the Complaint.

9. Defendant admits paragraph 9 of the Complaint.

10. Defendant admits paragraph 10 of the Complaint, except for the reference to 28 U.S.C. § 57 instead of 28 U.S.C. § 157.

11. Defendant admits paragraph 11 of the Complaint.

12. Defendant admits paragraph 12 of the Complaint.

13. Defendant has insufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 13 of the Complaint.

14. Defendant has insufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 14 of the Complaint.

15. Defendant has insufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 15 of the Complaint.

16. Defendant has insufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 16 of the Complaint.

17. Defendant has insufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 17 of the Complaint.

18. Defendant admits paragraph 18 of the Complaint as to Central Turf Farms, Inc., but otherwise has insufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 18 of the Complaint.

19. Defendant has insufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 19 of the Complaint.

20. Defendant denies paragraph 20 of the Complaint as to Central Turf Farms, Inc., but otherwise has insufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 20 of the Complaint.

21. Defendant denies paragraph 21 of the Complaint as to Central Turf Farms, Inc., but otherwise has insufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 21 of the Complaint.

22. No response is required to the legal conclusions in paragraph 22 of the Complaint. Otherwise, paragraph 22 of the Complaint is denied.

Affirmative Defenses

23. Plaintiff's Complaint fails to state claims upon which relief can be granted.

24. Defendant holds a valid and perfected mechanic's and materialman's lien on Plaintiff's and Trails of Sycamore, LP's trust funds and property and is entitled to judgment foreclosing its liens on the trust funds and property of Plaintiff and Trails of Sycamore, LP.

25. The post-petition perfection by Defendant of mechanic's liens under state law is specifically excepted from the automatic stay pursuant to Bankruptcy Code §§ 362(b)(3) and 546(b).

26. Pursuant to Tex. Prop. Code § 53.121, Defendant, as a subcontractor, has priority over other creditors of the Debtor, including Comresco, or Plaintiff.

27. Defendant's lien has priority over other liens pursuant to Tex. Prop. Code § 53.123.

WHEREFORE, PREMISES CONSIDERED, Defendant Central Turf Farms, Inc. respectfully prays that Plaintiff take nothing by its suit. Defendant further prays for general relief.

Respectfully submitted,

BARNET B. SKELTON, JR., P.C.

/s/

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ATTORNEY FOR DEFENDANT,
CENTRAL TURF FARMS, INC.

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2005 a copy of the foregoing Original Answer of Central Turf Farms, Inc. was served upon the parties entitled to notice under Local Rule 9013 and listed below:

Richard J. Wallace, III
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c/o Frank L. Griffin
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United States Trustee
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/s/
Barnet B. Skelton, Jr.